

Robert W. Turken
Mitchell E. Widom
Scott N. Wagner
BILZIN SUMBERG BAENA PRICE &
AXELROD LLP
1450 Brickell Avenue, Suite 2300
Miami, Florida 33131-3456
Telephone: 305-374-7580
Facsimile: 305-374-7593
E-mail: rturken@bilzin.com; mwidom@bilzin.com;
swagner@bilzin.com

Stuart H. Singer
BOIES, SCHILLER, & FLEXNER LLP
401 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, Florida 33301
Telephone: (954) 356-0011
Facsimile: (954) 356-0022
E-mail: ssinger@bsflp.com

Counsel for Plaintiffs Tech Data Corporation and Tech Data Product Management, Inc.; The AASI Creditor Liquidating Trust, by and through Kenneth A. Welt, Liquidating Trustee;

[Additional counsel listed in signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

In re: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

CASE NO. M:07-md-01827-SI

MDL No. 1827

CASE NOS. 3:10-cv-05458-SI;
3:11-cv-00829-SI; 3:11-cv-02225-SI;
3:11-cv-02495-SI; 3:11-cv-03763-SI;
3:11-cv-03856-SI; 3:11-cv-04119-SI;
3:11-cv-05765-SI; 3:11-cv-05781-SI;
3:11-cv-06241-SI; 3:12-cv-01426-SI;
3:10-cv-05625-SI; 3:10-cv-03205 SI;

This Document Relates to:
SB Liquidation Trust v. AU Optronics Corp., et al., 3:10-cv-05458-SI

MetroPCS Wireless, Inc. v. AU Optronics Corp., et al., 3:11-cv-00829-SI

Office Depot, Inc. v. AU Optronics Corp., et al., 3:11-cv-02225-SI

Jaco Electronics, Inc. v. AU Optronics Corp., et al., 3:11-cv-02495-SI

STIPULATION AND [PROPOSED] ORDER SETTING TRACK 2 DEADLINES

1 *Interbond Corp. of America v. AU*
2 *Optronics Corp., et al., 3:11-cv-03763-SI*

3 *Schultze Agency Services, LLC, on behalf*
4 *of Tweeter Opco, LLC and Tweeter*
5 *Newco, LLC, v. AU Optronics Corp., et*
6 *al., 3:11-cv-03856-SI*

7 *P.C. Richard & Son Long Island Corp., et*
8 *al. v. AU Optronics Corp., et al., 3:11-cv-*
9 *04119-SI*

10 *Tech Data Corp., et al. v. AU Optronics*
11 *Corp., et al., 3:11-cv-05765-SI*

12 *The AASI Creditor Liquidating Trust, by*
13 *and through Kenneth A. Welt, Liquidating*
14 *Trustee v. AU Optronics Corp., et al.,*
15 *3:11-cv-05781-SI*

16 *CompuCom Systems, Inc. v. AU Optronics*
17 *Corp., et al., 3:11-cv-06241-SI*

18 *NECO Alliance LLC v. AU Optronics*
19 *Corp., et al., 3:12-cv-01426-SI*

20 *Alfred H. Siegel, as Trustee of the Circuit*
21 *City Stores, Inc. Liquidating Trust v. AU*
22 *Optronics Corp., et al., 3:10-cv-05625-SI*

23 *Tracfone Wireless, Inc. v. AU Optronics*
24 *Corporation, et al., 3:10-cv-03205-SI*

25 Plaintiffs in the above-captioned cases (collectively, "Track 2 cases") and Defendants in
26 the Track 2 cases (respectively, "Plaintiffs" and "Defendants," collectively, "Parties") hereby
27 stipulate as follows:

28 WHEREAS the Track 2 cases have been proceeding with pretrial preparation in
29 accordance with the Court's Order dated September 6, 2013 (Dkt. No. 8589) and the deadline for
30 service of reply expert reports for Defendants in the Track 2 cases is presently January 27, 2014;

1 WHEREAS, on October 31, 2013, Defendants submitted opposition expert reports from
2 their experts in the Track 2 Cases;

3 WHEREAS counsel for Plaintiffs have requested and counsel for Defendants have agreed
4 that Plaintiffs should receive a three-week extension for submitting their reply expert reports,
5 with the result that all other unexpired deadlines pertaining to expert discovery would be
6 extended to preserve approximately the same number of days previously provided for under the
7 original schedule, as set forth below;

8 WHEREAS the following extensions for unexpired deadlines in the Track 2 cases will
9 not prejudice any of the Parties or the Court because the trial dates have not been scheduled for
10 any of these cases;

11 WHEREAS the Court's December 12, 2013 Stipulation and Order Setting Revised
12 Deadlines in Track 2 Re: Summary Judgment Motion Lists (Dkt. No. 8833) set forth a schedule
13 for the Parties to meet and confer and set January 13, 2014 as the deadline for the Parties to file
14 with the Court a Joint List of Proposed Summary Judgment Motions and Proposed Schedule for
15 Summary Judgment Filings; and

16 WHEREAS the Parties have met and conferred and determined that the Parties would
17 benefit from additional time to (1) meet and confer regarding the Proposed List of Summary
18 Judgment Motions and Proposed Schedule for same; and (2) to file with the Court a Joint List of
19 Proposed Summary Judgment Motions and Proposed Schedule for Summary Judgment Filings;

20 NOW THEREFORE, IT IS HEREBY STIPULATED between counsel for Plaintiffs and
21 counsel for Defendants in the Track 2 cases, and subject to the concurrence of the Court, that the
22 Track 2 cases, other than the *State of Oregon* case and the *Hewlett-Packard* case, will adopt the
23 following Track 2 case schedule:

Event	Current Date (Under September 6, 2013 Order)	Revised Date
File a Joint List of Proposed Summary Judgment Motions and Proposed Schedule for Summary Judgment Filings	January 13, 2014 ¹	January 27, 2014
Service of reply expert reports	January 27, 2014	February 14, 2014
Service of underlying data and Code	February 4, 2014	February 19, 2014
Service of sur-rebuttal expert reports on downstream pass-on	April 9, 2014	May 15, 2014
Service of underlying data and Code	April 15, 2014	May 20, 2014
Last Day to File Supplemental List of Summary Judgment Motions Based Upon New Information or Issues Raised in the Reply Expert Reports	March 27, 2014	April 21, 2014
Last day to file dispositive Motions	April 25, 2014	June 2, 2014
Close of expert discovery	May 20, 2014	June 25, 2014
Last day to file oppositions to dispositive motions	June 6, 2014	July 14, 2014
Last day to file reply briefs in support of dispositive motions	July 18, 2014	August 25, 2014
Last day for hearing dispositive motions	August 1, 2014	September 12, 2014

IT IS SO STIPULATED.

Dated: January 10, 2014

Respectfully Submitted,

By: /s/Scott N. Wagner

ROBERT W. TURKEN
 MITCHELL E. WIDOM
 SCOTT N. WAGNER
 BILZIN SUMBERG BAENA PRICE &
 AXELROD LLP
 1450 Brickell Ave., Suite 2300
 Miami, Florida 33131-3456
 Telephone: (305) 374-7580
 Facsimile: (305) 374-7593

¹ Under December 12, 2013 Stipulation and Order Setting Revised Deadlines in Track 2 Re: Summary Judgment Motion Lists (Dkt. No. 8833).

1 E-mail: rturken@bilzin.com
2 mwidom@bilzin.com
3 swagner@bilzin.com

4 *Counsel for Plaintiffs Tech*
5 *Data Corporation and Tech Data Product*
6 *Management, Inc. and The AASI Creditor*
7 *Liquidating Trust, by and through Kenneth A. Welt,*
8 *Liquidating Trustee*

9 By: /s/ Philip J. Iovieno
10 William Isaacson (admitted *pro hac vice*)
11 Melissa Felder (admitted *pro hac vice*)
12 BOIES, SCHILLER & FLEXNER LLP
13 5301 Wisconsin Avenue NW, Suite 800
14 Washington, DC 20015
15 Telephone: (202) 237-2727
16 Facsimile: (202) 237-6131
17 Email: wisaacson@bsflpp.com
18 mfelder@bsflpp.com

19 Philip J. Iovieno (admitted *pro hac vice*)
20 Anne M. Nardacci (admitted *pro hac vice*)
21 Luke Nikas (admitted *pro hac vice*)
22 Christopher Fenlon (admitted *pro hac vice*)
23 BOIES, SCHILLER & FLEXNER LLP
24 10 North Pearl Street, 4th Floor
25 Albany, NY 12207
26 Telephone: (518) 434-0600
27 Facsimile: (518) 434-0665
28 Email: piovieno@bsflpp.com
anardacci@bsflpp.com
lnikas@bsflpp.com
cfenlon@basflpp.com

29 *Attorneys for Plaintiffs MetroPCS Wireless, Inc.;*
30 *Office Depot, Inc.; Interbond Corp. of America;*
31 *Schultze Agency Services, LLC; P.C. Richard & Son*
32 *Long Island Corporation; MARTA Cooperative of*
33 *America, Inc.; ABC Appliance Inc.; Tech Data Corp.*
34 *and Tech Data Product Management, Inc.; The AASI*
35 *Creditor Liquidating Trust; CompuCom Systems, Inc.;*
36 *and NECO Alliance LLC*

1 By: /s/ Jerome A. Murphy

2 Jeffrey H. Howard (*pro hac vice*)
3 Jerome A. Murphy (*pro hac vice*)
4 CROWELL & MORING LLP
5 1001 Pennsylvania Avenue, N.W.
6 Washington, DC 20004
7 Telephone: (202) 624-2500
8 Facsimile: (202) 628-5116
9 Email: jhoward@crowell.com
10 jmurphy@crowell.com

11 Jason C. Murray (CA Bar No. 169806)
12 Janet I. Levine (CA Bar No. 94255)
13 Joshua C. Stokes (CA Bar No. 220214)
14 CROWELL & MORING LLP
15 515 South Flower Street, 40th Floor
16 Los Angeles, CA 90071
17 Telephone: (213) 622-4750
18 Facsimile: (213) 622-2690
19 Email: jmurray@crowell.com
20 jlevine@crowell.com
21 jstokes@crowell.com

22 Kenneth L. Adams (*pro hac vice*)
23 R. Bruce Holcomb (*pro hac vice*)
24 Christopher T. Leonardo (*pro hac vice*)
25 ADAMS HOLCOMB LLP
26 1875 Eye Street NW
27 Washington, DC 20006
28 Telephone: (202) 580-8822
Facsimile: (202) 580-8821
Email: adams@adamsholcomb.com
holcomb@adamsholcomb.com
leonardo@adamsholcomb.com

29 *Attorneys for Plaintiffs Jaco Electronics, Inc. and*
30 *Rockwell Automation, Inc., and Plaintiffs' Liaison*
31 *Counsel*

1 By: /s/ H. Lee Godfrey
2 H. Lee Godfrey
3 Kenneth S. Marks
4 Jonathan J. Ross
5 Johnny W. Carter
6 SUSMAN GODFREY L.L.P.
7 1000 Louisiana Street, Suite 5100
8 Houston, TX 77002
9 Telephone: (713) 651-9366
10 Facsimile: (713) 654-6666
11 Email: lgodfrey@susmangodfrey.com
12 kmarks@susmangodfrey.com
13 jross@susmangodfrey.com
14 jcarter@susmangodfrey.com

15 Parker C. Folse III
16 Rachel S. Black
17 Jordan Connors
18 SUSMAN GODFREY L.L.P.
19 1201 Third Avenue, Suite 3800
20 Seattle, WA 98101-3000
21 Telephone: (206) 516-3880
22 Facsimile: (206) 516-3883
23 Email: pfolse@susmangodfrey.com
24 rblack@susmangodfrey.com
25 jconnors@susmangodfrey.com

26 *Attorneys for Plaintiff Alfred H. Siegel, as Trustee of
27 the Circuit City Stores, Inc. Liquidating Trust*

Bilzin Sumberg Baena Price & Axelrod LLP
1450 Brickell Avenue, Suite 2300
Miami, FL 33131-3456

1 By: /s/ Marc M. Seltzer
2 Marc M. Seltzer (54534)
3 Steven G. Sklaver (237612)
4 SUSMAN GODFREY LLP
5 1901 Avenue of the Stars, Suite 950
6 Los Angeles, CA 90067-6029
7 Telephone: (310) 789-3100
8 Facsimile: (310) 789-3150
9 Email: mseltzer@susmangodfrey.com
ssklaver@susmangodfrey.com

10 Erica W. Harris
11 SUSMAN GODFREY LLP
12 1000 Louisiana, Suite 5100
13 Houston, TX 77002-5096
14 Telephone: (713) 651-9366
15 Facsimile: (713) 654-6666
16 Email: eharris@susmangodfrey.com

17 *Attorneys for SB Liquidation Trust*

18 By: /s/ James B. Baldinger
19 James B. Baldinger
20 Florida Bar No.: 869899
jbalddinger@carltonfields.com
Robert L. Ciotti
Florida Bar No.: 333141
rciotti@carltonfields.com
David B. Esau
Florida Bar No.: 650331
desau@carltonfields.com
CARLTON FIELDS, P.A.
CityPlace Tower – Suite 1200
525 Okeechobee Boulevard
West Palm Beach, Florida 33401
Telephone: (561) 659-7070
Facsimile: (561) 659-7368

21 *Counsel for TracFone Wireless, Inc.*

1 By: /s/ Lee F. Berger
2 Holly A. House (State Bar No. 136045)
3 Kevin C. McCann (State Bar No. 120874)
4 Lee F. Berger (State Bar No. 222756)
5 Sean Unger (State Bar No. 231694)
6 PAUL HASTINGS LLP
7 55 Second Street
8 Twenty-Fourth Floor
9 San Francisco, CA 94105
10 Telephone: (415) 856-7000
11 Facsimile: (415) 856-7100
12 Email: kevinmccann@paulhastings.com
hollyhouse@paulhastings.com
leeberger@paulhastings.com
seanunger@paulhastings.com
13 Brad D. Brian (State Bar No. 079001)
Jerome C. Roth (State Bar No. 159483)
MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue
Los Angeles, CA 90071-1560
Telephone: (213) 683-9100
Facsimile: (213) 687-3702
Email: Brad.Brian@mto.com
14

15 *Attorneys for Defendants LG Display Co., Ltd. and LG*
Display America, Inc.
16

17 By: /s/ Stephen P. Freccero
Stephen P. Freccero (SBN 131093)
Melvin R. Goldman (SBN 34097)
Derek F. Foran (SBN 224569)
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105
Telephone: (415) 268-7000
Facsimile: (415) 268-7522
Email: mgoldman@mofo.com
sfreccero@mofo.com
dforan@mofo.com
18
19
20
21
22 *Attorneys for Defendants Epson Imaging Devices*
Corporation and Epson Electronics America, Inc.
23
24
25
26
27
28

1 By: /s/ Carl L. Blumenstein
2 Carl L. Blumenstein (State Bar No. 124158)
3 Christopher A. Nedeau (State Bar No. 81297)
4 Farschad Farzan (State Bar No. 215194)
5 NOSSAMAN LLP
6 50 California Street, 34th Floor
7 San Francisco, CA 94111
8 Telephone: (415) 398-3600
9 Facsimile: (415) 398-2438
10 Email: cnedea@nossaman.com
11 cblumenstein@nossaman.com
12 ffarzan@nossaman.com

13 *Attorneys for Defendants AU Optronics Corporation
14 and AU Optronics Corporation America*

15 By: /s/ Christopher M. Curran
16 Christopher M. Curran (*pro hac vice*)
17 Martin M. Toto (*pro hac vice*)
18 John H. Chung (*pro hac vice*)
19 WHITE & CASE LLP
20 1155 Avenue of the Americas
21 New York, NY 10036
22 Telephone: (212) 819-8200
23 Facsimile: (212) 354-8113
24 Email: ccurran@whitecase.com
25 mtoto@whitecase.com
26 jchung@whitecase.com

27 *Attorneys for Toshiba Corporation, Toshiba Mobile
28 Display Co., Ltd., Toshiba America Electronic
Components, Inc. and Toshiba America Information
Systems, Inc.*

1 By: /s/ Neal A. Potischman

2 Neal A. Potischman (SBN 254862)
3 neal.potischman@davispolk.com
4 DAVIS POLK & WARDWELL LLP
5 1600 El Camino Real
6 Menlo Park, California 94025
7 Telephone: (650) 752-2000
8 Facsimile: (650) 752-2111

9
10 *Counsel for Chi Mei Optoelectronics Corporation
11 (n/k/a Innolux Corporation), CMO Japan Co., Ltd.,
12 and Chi Mei Optoelectronics USA, Inc. for the Office
13 Depot, Inc., Interbond Corp. of America, Schultze
14 Agency Services, LLC, P.C. Richard & Son Long
15 Island Corp., et al., Tech Data Corp., et al., The AASI
16 Creditor Liquidating Trust, CompuCom Systems, Inc.,
17 and NECO Alliance LLC Actions Only*

18 /s/ Michael R. Scott

19 Michael R. Scott (pro hac vice)
20 mrs@hcmp.com
21 Michael J. Ewart (pro hac vice)
22 mje@hcmp.comHILLIS CLARK MARTIN &
23 PETERSON P.S.
24 1221 Second Avenue, Suite 500
Seattle, WA 98101-2925
Telephone: (206) 623-1745
Facsimile: (206) 623-7789

25 *Counsel for Chi Mei Optoelectronics Corporation
26 (n/k/a Innolux Corporation), CMO Japan Co., Ltd.,
27 and Chi Mei Optoelectronics USA, Inc. for the
28 MetroPCS Wireless, Inc. Action Only*

19 By: /s/ William S. Farmer

20 William S. Farmer (SBN 46694)
21 David C. Brownstein (SBN 141929)
22 Jacob P. Alpren (SBN 235713)
23 FARMER BROWNSTEIN JAEGER LLP
24 235 Pine Street, Suite 1300
San Francisco, CA 94104
Telephone: (415) 795-2050
Email: wfarmer@fbj-law.com
dbrownstein@fbj-law.com
jalpren@fbj-law.com

25 *Counsel for Chunghwa Picture Tubes, Ltd. in the
26 MetroPCS Wireless Actions Only*

1 By: /s/ Rachel S. Brass

2 Rachel S. Brass (SBN 219301)
3 Joel S. Sanders (SBN 107234)
4 Austin V. Schwing (SBN 211696)
5 GIBSON, DUNN & CRUTCHER LLP
6 555 Mission Street, Suite 3000
7 San Francisco, California 94105
8 (415) 393-8200 / (415) 393-8306
9 *jsanders@gibsondunn.com*
rbrass@gibsondunn.com

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
*Attorneys for Defendants Chunghwa Picture Tubes,
Ltd. in the BrandsMart, Office Depot, Interbond,
Schultze Agency Services, PC Richard, Tech Data,
AASI Creditor Liquidating Trust, CompuCom,
Viewsonic, and NECO Alliance Actions Only*

By: /s/ Harrison J. Frahn IV

James G. Kreissman (SBN 206740)
Harrison J. Frahn IV (SBN 206822)
Jason M. Bussey (SBN 227185)
Elizabeth A. Gillen (SBN 260667)
Melissa D. Schmidt (SBN 266487)
SIMPSON THACHER & BARTLETT LLP
2475 Hanover Street
Palo Alto, California 94304
Telephone: (650) 251-5000
Facsimile: (650) 251-5002
jkreissman@stblaw.com
hfrahn@stblaw.com
jbussey@stblaw.com
egillen@stblaw.com
melissa.schmidt@stblaw.com

*Attorneys for Defendant HannStar Display
Corporation*

1 By: /s/ Jacob R. Sorensen
2 Jacob R. Sorensen (SBN 209134)
3 John M. Grenfell (SBN 88500)
4 Fusae Nara (*pro hac vice*)
5 Andrew D. Lanphere (SBN 191479)
6 PILLSBURY WINTHROP SHAW PITTMAN LLP
7 4 Embarcadero Center, 22nd Floor
8 San Francisco, CA 94111
9 Telephone: (415) 983-1000
10 Facsimile: (415) 983-1200
11 Email: john.grenfell@pillsburylaw.com
12 jake.sorensen@pillsburylaw.com
13 fusae.nara@pillsburylaw.com
14 andrew.lanphere@pillsburylaw.com

15 *Attorneys for Defendants SHARP CORPORATION and*
16 *SHARP ELECTRONICS CORPORATION*

17 By: /s/ Michael W. Scarborough
18 Michael W. Scarborough (SBN 203524)
19 SHEPPARD MULLIN RICHTER & HAMPTON
20 Four Embarcadero Center, 17th Floor
21 San Francisco, CA 94111
22 Telephone: (415) 434-9100
23 Facsimile: (415) 434-3947
24 Email: mscarborough@sheppardmullin.com

25 *Attorneys for Defendants Samsung SDI America, Inc.*
26 *and Samsung SDI Co., Ltd.*

27 Pursuant to General Order No. 45, § X-B, the filer attests that concurrence in the filing of this
28 document has been obtained from each of the above signatories.

29 **IT IS SO ORDERED.**

30 Dated: 1/14/14



31 Hon. Susan Illston
32 United States District Judge